162073

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

JUL **12** 2013

PUBLIC SERVICE

COMMISSION

IN THE MATTER OF:	
	)
APPLICATION OF RIG RIVERS ELECTRIC	ĺ

APPLICATION OF BIG RIVERS ELECTRIC ) Case No. 2013-00199 CORPORATION FOR A GENERAL ) ADJUSTMENT IN RATES )

## MOTION OF JACKSON PURCHASE ENERGY CORPORATION TO INTERVENE

Now comes Jackson Purchase Energy Corporation ("JPEC"), through counsel, and moves, pursuant to 807 KAR 5:001 Section 3(8) that it be granted full intervention herein. In support of this motion, JPEC state as follows:

- 1. JPEC is a distribution cooperative and a member of Big Rivers Electric Corporation ("Big Rivers"), the applicant in this proceeding. As a member of Big Rivers, JPEC has an interest in this proceeding because it will be directly affected by the Commission's rulings and orders herein. The outcome of this case will affect JPEC's members, tariffs and relationship with Big Rivers.
- 2. JPEC's address is 2900 Irvin Cobb Drive, Paducah, Kentucky 42002. JPEC's mailing address is P.O. Box 3188, Paducah, Kentucky 42002-3188.
- 3. JPEC should be permitted to intervene because its interest is not otherwise adequately represented by any other party. Further, JPEC's intervention will likely present issues or develop facts that assist the Commission in full considering the matter without unduly complicating or disrupting the proceedings and without prejudice to any other party.
- 4. If the JPEC is granted full intervention, service of all documents required to be served on the parties should be made on the following persons:

- Kelly Nuckols
   President & CEO
   Jackson Purchase Energy Corporation
   2900 Irvin Cobb Drive
   Paducah, Kentucky 42001
   or
   PO Box 3188
   Paducah, Kentucky 42002-3188
- Melissa Yates
   Counsel for Jackson Purchase Energy Corporation
   555 Jefferson Street
   Suite 301
   Paducah, Kentucky 42001
   Fax (270) 442-6000

WHEREFORE, JPEC moves to be granted full intervention and it be afforded any and all relief to which it may appear entitled.

Respectfully submitted,

DENTON & KEULER

P.O. BOX 929

PADUCAH, KY 42002-0929

Telephone: (270) 443-8253 Facsimile: (270) 442-6000

Bv:

Melissa D. Yates

ATTORNEYS FOR JACKSON

PURCHASE ENERGY CORPORATION

## CERTIFICATE OF SERVICE

I hereby certify the foregoing was filed with the Public Service Commission by via hand delivery and copies were served via regular mail on the persons named in the attached service list by mailing true and correct copies of the same this the day of July, 2013.

Melissa D. Yates